

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

NORMAN BROWN, et al.

Plaintiffs,

v.

ANNE L. PRECYTHE, et al.,

Defendants.

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Case No. 17-cv-4082

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

COME NOW Plaintiffs, pursuant to Fed. R. Civ. P. 23, and respectfully request that this Court certify a Plaintiff Class on the claims set forth in the Second Amended Complaint (ECF No. 65) for the reasons set forth in Plaintiffs' suggestions, filed contemporaneously herewith. Plaintiffs request that the Court certify a class of plaintiffs defined as:

Individuals in the custody of the Missouri Department of Corrections who were sentenced to life without parole under a mandatory sentencing scheme and who were under 18 years of age at the time of the offense.

WHEREFORE, Plaintiffs respectfully request that this Court certify a Plaintiff Class of all individuals in the custody of the Missouri Department of Corrections who were sentenced to life without parole under a mandatory sentencing scheme and who were under 18 years of age at the time of the offense; appoint Norman Brown, Ralph McElroy, Sidney Roberts, and Theron Roland as class representatives; and appoint Amy E. Breihan, Matthew D. Knepper, Sarah L. Zimmerman, Denyse L. Jones, and Jordan T. Ault as class counsel.

Respectfully submitted,

RODERICK AND SOLANGE MACARTHUR JUSTICE CENTER

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Dated: March 30, 2018

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of March, 2018, a true and correct copy of the foregoing was electronically filed using the Court's online case filing system, which will send notice to all counsel of record.

By: /s/ Amy E. Breihan
One of Plaintiffs' Attorneys